

From: "Stonick, Mark" <cpmstoni@NMHG.COM>
To: "'FR0001@ustr.gov'" <FR0001@ustr.gov>
Date: Tue, Dec 11, 2001 2:33 PM
Subject: Steel, Investigation No. TA-201-73; Exclusion Requests

Dear Ms. Blue -

Pursuant to the notice of request for comments published at 66 Fed. Reg. 54321 (Oct. 26, 2001), I hereby submit the enclosed exclusion request for the following products on behalf of Hoesch Hohenlimburg GmbH and German Special Profiles Inc.:

1. Carbon Steel Special Profiles

My name is Mark Stonick, and I am the global commodity team leader for rolled-steel profiles and sections for NACCO Materials Handling Group, Inc. (NMHG). We are a \$1.7 Billion company Headquartered in Portland, Oregon, and are the parent company for both the Hyster and Yale forklift brands. We currently have five (5) manufacturing operations in the United States, employing over 2,800 people. I oversee the selection of select commodity suppliers for use in our products, and therefore oversee the products produced for NMHG by Hoesch Hohenlimburg GmbH and supplied through German Special Profiles Inc.

Along with our development partner Cascade Corporation (CasCorp) of Portland Oregon, we utilize Hoesch Hohenlimburg GmbH (Hoesch) and German Special Profiles Inc. (GSP) to provide both companies with rolled steel profiles that meet the specific design requirements of both of our engineering teams, or in other words, these profiles are per our design details, and are considered proprietary to our respective products. These are not commodity profiles that can be used by any other manufacturer. A significant amount of tooling money has been spent to develop and produce these profiles, and we have recently transitioned the "used on" product (Integral Side-Shift Carriages) into full production.

NMHG and CasCorp have both made a significant commitment to Hoesch / GSP due to their ability to produce profiles that can not be produced by Steel of West Virginia, which is the only recognized United States based manufacturer that produces similar profiles. We consume a significant amount of product from Steel of West Virginia, but they were not able to produce such fine shapes, as their rolling mills are set up for remote profile manipulation, and these hydraulic actuated manipulators would crush our profiles and render them unsuitable for the final rolling operations. This business opportunity was originally submitted to Steel of West Virginia, but their quote was not complete and was therefore not accepted, due to their inability to provide all interacting sections.

NMHG would like to support the Exclusion Request submitted by Hoesch Hohenlimburg GmbH and German Special Profiles Inc. on November 13th. NMHG supports their statements as true and accurate, as relates to NMHG.

NMHG would like it to be known that failure to achieve exclusion status for Hoesch Hohenlimburg GmbH and German Special Profiles Inc. and the products

they produce for NMHG would cause NMHG significant undue harm and damage in our highly-competitive marketplace, as many of our competitors can import completed assemblies without restrictions. In our current economic situation as a company and a nation, NMHG hopes you can take a position that allows us to remain viable and competitive in our marketplace.

If there are any questions in regards to this request, please contact:

**Mark Stonick
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